

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(OAKLAND DIVISION)

ROBERT HAHN, MICHAEL MCHUGH,
LAWRENCE VALENTI, AND JOHN
MCGOVERN, In Their Capacities As
Trustees Of, And On Behalf Of, The LABOR
ALLIANCE MANAGED TRUST FUND,

Plaintiffs,

v.

ALBERTSON’S, INC.,

Defendant.

) No. CV 04-00873 SI
)
)
)
) **STIPULATION FOR ORDER OF**
) **DISMISSAL BASED ON SETTLEMENT**
) **AND RETAINING JURISDICTION OVER**
) **SETTLEMENT**
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1. All of the parties have entered into a Settlement Agreement and Release of Claims, a copy of which is attached to this Stipulation as Exhibit A.

2. Pursuant to the terms of the Stipulation, the parties request that the Court enter an Order that contains substantially the following provisions:

a. This civil action, No. C 04-00873 SI, shall be, and is, dismissed without prejudice, provided that

b. All claims of the parties respecting obligations arising in the period of December 1, 2003 through January 31, 2004, and all claims of the parties related to a labor dispute

1 involving the United Food & Commercial Workers Union or any other organization during the
2 period of December 1, 2003 through January 31, 2004 shall be, and are, dismissed with prejudice,
3 and

4 c. The Court shall retain jurisdiction for the purpose of enforcing the settlement
5 agreement.

6 **ATTORNEYS FOR PLAINTIFFS:**

7 Dated: _____, 2004.

WEINBERG, ROGER & ROSENFELD
A Professional Corporation

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9 By: //s// _____
10 WILLIAM A. SOKOL
11 CHRISTIAN L. RAISNER
12 DAVID A. BOHL
Attorneys for Plaintiffs

13 **ATTORNEYS FOR DEFENDANTS:**

14 Dated: _____, 2004.

ALBERTSON'S, INC.

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16 By: //s// _____
17 Attorneys for Defendants
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